

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MIAMI DIVISION

CASE NO.: 05-22285-CIV-GOLD

JUSTA C. MORALES, as personal
representative of the estate of
GUSTAVO A. MORALES

Plaintiff,

v.

CITIGROUP, Inc. f/k/a THE NATIONAL CITY
BANK OF NEW YORK,

Defendant.

DECLARATION OF STEPHEN E. DIETZ

I, Stephen E. Dietz, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am General Counsel-Corporate Litigation of Citibank, N.A., and have reviewed the Amended Complaint in the above-captioned matter. I have also reviewed Defendant Citigroup's Memorandum in Support of Motion to Transfer Venue, as well as its Supplemental Memorandum. I make this declaration in support of Citigroup's¹ Motion to Transfer Venue, and have personal knowledge of the facts stated herein.
2. Citi's Anti-Money Laundering Legal and Compliance Departments, located in New York, are principally responsible for compliance with the Cuban Assets Control Regulations.² Records related to Citi's compliance with the Control Regulations are maintained in New York. Charles Sgro, General Counsel for Anti-Money Laundering and Investigative Services,³ and Robin Powell, U.S. Sanctions/Anti-Boycott Compliance Officer, both of whom are located in New York, have knowledge of how Citigroup interpreted its obligations under the regulations and whether the analysis was done in good faith.

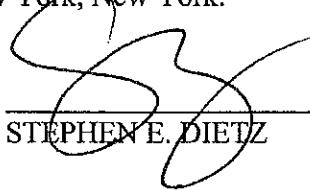
¹ Citigroup is a holding company, and the parent of various affiliated entities. I refer to these collective entities simply as "Citi" in this declaration.

² As reflected in my declaration of January 5, 2006, Citi's Bank Regulatory Department was previously charged with these duties.

³ Serena Moe, former Assistant General Counsel, is no longer with Citi. Mr. Sgro is now acting in her stead.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 23rd day of April 2007, in New York, New York.


STEPHEN E. DIETZ